

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

SHAWN NORTHRUP,	)	Case No.: 3:12-CV-01544-JHH
	)	
Plaintiff,	)	Judge: Jeffrey J. Helmick
	)	
v.	)	<b><u>MOTION FOR EXTENSION OF</u></b>
	)	<b><u>TIME TO RESPOND TO</u></b>
CITY OF TOLEDO, et al,	)	<b><u>DEFENDANTS' MOTION FOR</u></b>
	)	<b><u>SUMMARY JUDGMENT</u></b>
	)	
Defendants.	)	
	)	LYDY & MOAN, LTD.
	)	
	)	Daniel T. Ellis (0038555)
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	)	
	)	
	)	Counsel for Plaintiff
	)	
	)	
	)	

Plaintiff, Shawn Northrup ("Northrup" or "Plaintiff"), moves the Court to grant this motion for extension of time to respond to Defendants' Motion for Summary Judgment until

March 20, 2014. Plaintiff makes this motion based upon recent receipt of discovery materials and copies of depositions that must be incorporated in its response. A memorandum is attached and incorporated by reference.

**WHEREFORE**, Plaintiff moves this Court to enter an Order for an extension of time to March 20, 2014 to respond to Defendants' Motion for Summary Judgment.

Respectfully submitted,

/s/ Daniel T. Ellis

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Attorney for Plaintiff  
Shawn Northrup

#### **MEMORANDUM**

Defendants' filed a Motion for Summary Judgment on January 29, 2014. The Court had set February 28, 2014 as the deadline for the filing of Plaintiff's response to Defendant's motion for summary judgment. Plaintiff makes this motion based upon recent receipt of defendants' discovery materials and copies of depositions that must be incorporated into its response. Granting this request would extend the Plaintiff's time to respond by three weeks and is not interposed for delay. Attorney Madigan, defendants' attorney, has already consented to this request for an extension of time.

For these reasons, and not for the purpose of delay, the Plaintiff requests that the Court extend the time within which to file a response to Defendants' Motion for Summary Judgment until March 20, 2014.

Respectfully submitted,

/s/ Daniel T. Ellis

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Attorney for Plaintiff  
Shawn Northrup

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the following parties via the Court's electronic filing system, this 28<sup>th</sup> day of February, 2014:

John Madigan, Senior Attorney  
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City of Toledo, Department of Law  
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Toledo, OH 43604-2293

Counsel for Defendants

/s/ Daniel T. Ellis

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